

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT PIERCE DIVISION

CASE NO. 23-CR-80219-CANNON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL GORDON DOUGLAS.

Defendant.

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**MICHAEL DOUGLAS'S PROPOSED VOIR DIRE QUESTIONS**

Mr. Michael Douglas, through counsel, respectfully submits the following proposed voir dire questions pursuant to the Court's trial orders at DE 20 and 112:

1. If you typically enjoy non-fiction books (or non-fiction movies and tv shows) more than you do fiction books, movies, and tv shows, please raise your hand.
2. If you have never chatted online with someone you did not personally know, for example through a phone or computer application, please raise your hand.
3. If you or anyone close to you has ever been the victim of sexual assault, sexual abuse, or sexual molestation, please raise your hand.
4. If you have a firm belief that any of the following is morally wrong—watching, possessing, or creating pornography—please raise your hand.
5. If you have a firm belief that a person who has been arrested for a sexual offense involving a child is more likely to have committed that crime than a person who may have been arrested for some other non-sexual offense, please raise your hand.

The defense has conferred with the Government, and the Government has confirmed it has no objection to the foregoing questions being asked of the panel.

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Respectfully Submitted,

**HECTOR A. DOPICO**  
**FEDERAL PUBLIC DEFENDER**

By: /s/ Srilekha Jayanthi  
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### **CERTIFICATE OF SERVICE**

I HEREBY certify that on **April 28, 2025**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Srilekha Jayanthi